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November 29, 2018

**Via ECF**

Honorable Judge Margo K. Brodie  
United States District Court for the Eastern District of New York  
225 Cadman Plaza East  
Brooklyn New York, 11201  
Courtroom: 6F  
Chambers: N 626

Re: Luxclub Inc. v. DGL Group, LTD et al.,  
Civil Action No. 1:18-cv-04741-MKB-ST

Dear Judge Brodie,

The undersigned firm has recently been retained by defendants DGL Group, Ltd., Ezra Zaafarani, Mark Nakash, Victor Sardar and Elie Wahba (the "DGL Defendants") in the above-captioned RICO action, which was filed on August 22, 2018. The DGL Defendants believe they received a copy of the summons and complaint on or about November 12, 2018, and therefore that a responsive pleading should be filed by December 3, 2018.

The parties have conferred in good faith and jointly request that the Court adjourn the date to answer or otherwise move to and including **January 11, 2019**.

This is the first letter motion requesting an extension of time to answer or otherwise respond.

Additionally, the parties request that the initial in-person conference currently scheduled for December 17, 2018 be adjourned until after the deadline for the filing of an answer or responsive motion.

Respectfully submitted,

/s/ David R. King.

David R. King

cc: All counsel of Record (via ECF)